



ChargePoint, Inc.
254 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

August 28, 2023

Lynne Cayting
17 State House Station
Augusta, ME 04333-0017
Lynne.A.Cayting@maine.gov

Re: Proposed Chapter 128: Advanced Clean Trucks Regulation

Ms. Cayting:

ChargePoint thanks the Board of Environmental Protection (Board) for its proposal to adopt California’s Advanced Clean Trucks Program (ACT) regulation in Maine. ChargePoint supports the proposed change to incorporate Chapter 128, which would adopt the ACT regulation and, in turn, require manufacturers to produce zero-emission trucks over 8,500 pounds gross vehicle weight rating (GVWR) beginning with model year 2027.

I. About ChargePoint

ChargePoint is a world leading electric vehicle (EV) charging network with a comprehensive set of charging solutions available to customers. Since 2007, ChargePoint has been creating the new fueling network to move all people and goods on electricity. ChargePoint is committed to making it easy for businesses and drivers to go electric. ChargePoint’s cloud subscription platform and software defined charging hardware is designed internally and includes options for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, corridor, and fleets of all kinds. ChargePoint’s primary business model is to sell our integrated charging software and hardware solutions directly to site hosts and provide services that enable them to provide charging services that align with their specific needs. Today, one ChargePoint account provides access to hundreds of thousands of places to charge in North America and Europe, with hundreds of public and private ChargePoint chargers located across Maine. To date, more than 172 million charging sessions have been delivered across more than 240,000 ChargePoint ports worldwide, with drivers plugging into the ChargePoint network on average every second.

II. Comments on ACT Regulation

Adopting the ACT regulation will help Maine move forward with its goals to reduce greenhouse gas (“GHG”) emissions, which is essential for meeting the state’s Climate Action Plan and improving air quality for all.¹ The ACT regulation will also create quality jobs for Maine’s residents to build, install, and

¹ <https://www.maine.gov/climateplan/the-plan>.

maintain the electric vehicle supply equipment (“EVSE”) needed to support an increasingly electrified trucking and logistics industry. The ACT regulation is arguably one of the most effective tools available to rapidly advance the market of electric medium- and heavy-duty vehicles. As such, ChargePoint recommends the ACT regulation be adopted in Maine by the Board.

Reaching 100% transportation electrification by 2035 presents myriad societal benefits. For instance, the American Lung Association estimates the cumulative benefits of attaining 100% zero-emission truck sales by 2050 in counties with trucking routes of at least 8,500 trips per day to include public health benefits worth \$735 billion, and the avoidance of 66,800 premature deaths, 1.75 million asthma attacks, and 8.5 million lost workdays.² This work is underscored by the importance of electrifying medium- and heavy-duty vehicles given their emissions contribute a disproportionate 29% of emissions despite being 10% of the vehicles on the road.³

Further, EV charging can be beneficial to the electrical distribution grid. Managed charging and/or the use of dynamic rates, if implemented effectively, can result in significant customer savings in the form of logistics and operational efficiencies for businesses and grid benefits through load management.

With demand projected to exceed supply, e-truck manufacturers will have to ramp up production by a factor of 20 by 2035 while meeting North American final assembly requirements.⁴ Requiring ACT now will jumpstart this process to allow Maine’s residents and businesses to realize the benefits of transportation electrification sooner rather than later.

Sincerely,

Matthew Deal
Senior Manager, Utility Policy
ChargePoint, Inc.
Matthew.deal@chargepoint.com

² <https://www.lung.org/getmedia/e1ff935b-a935-4f49-91e5-151f1e643124/zero-emission-truck-report>.

³ <https://link.springer.com/article/10.1007/s40518-021-00187-3>.

⁴ <https://rmi.org/inflation-reduction-act-will-help-electrify-heavy-duty-trucking/>.